



8 November 1996

Ms. Donna Gaffigan  
Bureau of Federal Case Management  
New Jersey Department of Environmental Protection  
401 E. State Street  
CN 028  
Trenton, New Jersey 08625

Re: Response to NJDEP Comments on the Draft Site 1 FFS Work Plan and the Draft Site 1 FFS Quality Assurance Project Plan for Naval Air Warfare Center (NAWC), Trenton, New Jersey

Dear Ms. Gaffigan:

This letter documents EA and the Navy's response to NJDEP comments (dated 5 September 1996) on the Draft Site 1 FFS Work Plan and QAPjP for NAWC Trenton (dated 1 July and 1 June 1996, respectively). Comments No. 5 and 6 were addressed by EA over the phone with Bill Hanrahan and yourself on 22 October and 6 November 1996, respectively.

Based on our phone conversation on 6 November, it is EA and the Navy's understanding that the Draft Work Plan and the Draft QAPjP will be considered Final upon approval of these responses by NJDEP. As you requested, copies of this letter will be attached as an addendum to the project plans, and replacement "Final" cover and title pages for both the Work Plan and the QAPjP will be submitted to NJDEP in lieu of revising the draft documents.

**Comment No. 1**

**The QAPjP must incorporate the requirements of New Jersey's Technical Requirements for Site Remediation, N. J. A. C. 7:26E et. seq. (Tech Regs), particularly Subchapter 2, Quality Assurance for Sampling and Laboratory Analysis. Although the QAPjP referenced several of the appropriate guidance documents, it did not reference the Tech Regs. In addition, NJDEP's Field Analysis Manual, July 1994 should be referenced and used.**

**Response 1**

The QAPjP has been developed based on the information, regulations, and guidance contained in the documents noted above by the reviewer. Although these documents are not included in the

reference list in Section 16, they are considered referenced in this addendum and field work will be performed in accordance with both guidance documents.

**Comment No. 2**

**In accordance with the Tech Regs, the laboratory shall be certified by NJDEP.**

**Response No. 2**

The laboratory (EA Laboratories) is certified by NJDEP.

**Comment No. 3**

**The QAPjP did not specify the level of laboratory data deliverables. Reduced laboratory data deliverables are acceptable.**

**Response No. 3**

Reduced laboratory deliverables will be provided to NJDEP.

**Comment No. 4 QAPjP Section 6 - Field Decontamination Procedures**

**Field decontamination shall be in accordance with the May 1992 Field Sampling Procedures Manual.**

**Response No. 4**

Field decontamination will be performed in accordance with NJDEP Field Sampling Procedures Manual (May 1992).

**Comment No. 5**

**On 22 October 1996, Bill Hanrahan (NJDEP) requested clarification from EA on the monitoring well construction procedures, specifically placement of the casing annular seal.**

**Response No. 5**

Based on the discussion with Mr. Hanrahan, the second paragraph on page 5-8 of the QAPjP is revised to read as follows (deletions are indicated by strikeouts, insertions by shading):

"Once the borehole is drilled to the proposed total depth, the target interval will be confirmed by geophysical logging. Casing will then be set and the annulus sealed. To seal the casing annulus without sealing the open borehole beneath the bottom of the casing, the bottom ~~18 to 20 feet~~ 20 to 25 feet of the borehole will be backfilled ~~using drill cuttings from the well, followed by 3 to 5 feet of filter packing (either No. 0 or No. 00 size well gravel)~~ using filter packing (either No. 1 or No. 0 size well sand). The casing will then be set at the top of the filter pack and the annulus will be grouted. After the grout has set, the backfilled open hole will be drilled out."

**Comment No. 6**

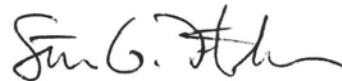
**On 6 November 1996, Donna Gaffigan (NJDEP) directed EA to correct the well purging procedures on page 5-14 of the QAPjP, specifically to remove the use of bailers as a method of purging monitoring wells prior to sampling.**

**Response No. 5**

Based on the discussion with Ms. Gaffigan, EA will limit the acceptable well purging methods to either submersible pump or peristaltic pump with dedicated tubing.

Please let me know if you have any changes to the responses outlined above. If you have any questions, or need further information, please call me at (908) 665-2440.

Sincerely,



Steven G. Feldmann, P.G.  
Geologist

SGF/rg

cc: E. Boyle, Northern Division  
J. Dale, Northern Division  
K. Smith, NAWC Trenton  
W. Lawler, USEPA  
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